



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: December 20, 2004

SUBJ: Request for a Removal Action at the Lonsdale Bleachery Site,
Lincoln, Providence County, Rhode Island - **Action Memorandum**

FROM: Frank Gardner, On-Scene Coordinator
Emergency Response and Removal Section II

THRU: Steven R. Novick, Chief
Emergency Response and Removal Section II

Arthur V. Johnson III, Chief
Emergency Planning & Response Branch

TO: Susan Studlien, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Lonsdale Bleachery Site, (the Site), which is located off Carrington Street in Lincoln, Providence County, Rhode Island. Hazardous substances present in building materials at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: RIN000103681
SITE ID#: 01CK
CATEGORY: Time Critical

A. Site Description

1. Removal site evaluation

While conducting emergency oil spill response activities on an adjacent property on August 5, 2004, EPA observed what appeared to be potentially asbestos containing material (ACM) on an overhead exterior pipe in the vicinity of the former boiler area. On September 22, 2004, EPA, the Superfund Technical Assessment and Response Team (START) contractor, and the Rhode Island Department of Environmental Management (RI DEM) mobilized to the Site to conduct a removal site investigation. During the investigation, START collected bulk samples from the overhead pipe and several other pipes in the former boiler area. The samples were analyzed at EPA's New England Regional Laboratory and found to contain friable asbestos (chrysotile) in concentrations up to 35 %. Based on the findings of the site investigation, a removal action was recommended on October 14, 2004.

2. Physical location

The Lonsdale Bleachery Superfund Site is a portion of a former textile mill known as the Lonsdale Bleachery. The Site consists of an approximately 1/3-acre parcel of property located off of Carrington Street, in Lincoln, Rhode Island. The geographic coordinates of the Site are 41.9111 north latitude and 71.4067 west longitude. The parcel is defined on Plat 5, Lot 60 on the Town of Lincoln Tax Assessors maps and at the Town of Lincoln Registry of Deeds in Book 249, Page 27. The Site is bounded by the Blackstone River and Town of Lincoln property to the north, the Blackstone River and industrial property to the east, and other industrial properties to the south and west.

3. Site characteristics

The Site is actively used for light industry and as a storage facility. The boiler area is unused, however, and not maintained. Pipes containing asbestos insulation are located both outside of the boiler room (over an active driveway) and inside the boiler room. Access to the Site by vehicles and pedestrians is not restricted. The boiler room has no roof and is exposed to the elements. Local topography slopes downward toward the Blackstone River, a National Heritage River. Local land use is primarily residential and commercial.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Friable asbestos (chrysotile) is present at levels up to 35% on piping in the former boiler area.

5. NPL status

The site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

B. Other Actions to Date

1. Previous actions

There have been no previous removal actions at the Site.

2. Current actions

There are no current removal actions at the Site.

C. State and Local Authorities' Roles

1. State and local actions to date

RI DEM is working closely with EPA (under Clean Water Act authorities) on oil spill response activities on an adjacent property (Map 5, Parcel 96) relative to an ongoing seepage of oil into the Blackstone River.

2. Potential for continued state/local response

RI DEM will assist EPA's removal action by providing ARARs and technical support.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

Friable asbestos is present in an area that is unrestricted to pedestrian and vehicular access. The presence of friable asbestos poses a direct contact threat to local residents and those who may enter the Site. According to the 2000 Census, 3058 people live within 1/2 mile, and four public schools are located within one mile.

Asbestos fibers may enter the body by inhalation or ingestion. Breathing asbestos can cause asbestosis, a buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. Symptoms of asbestosis include shortness of breath, coughing, and sometimes heart enlargement. Asbestosis is a serious disease that can lead to disability or death. Asbestos is also

a known human carcinogen. Inhalation of high levels of asbestos can cause cancer of the lung tissue itself and mesothelioma, a cancer of the membrane that surrounds the lung and other internal organs.¹

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released; [§300.415(b)(2)(v)];

The asbestos is exposed to wind, precipitation, freezing conditions, and sunlight. These weather conditions may increase the friability of the asbestos and facilitate its release into the environment.

The availability of other appropriate Federal or State response mechanisms to respond to the release; [§300.415(b)(2)(vii)];

RI DEM does not have the resources to address the friable asbestos at the Site.

B. Threats to the Environment

Actual or potential contamination of drinking water supplies or sensitive ecosystems; [§300.415(b)(2)(ii)];

A release of hazardous substances from the Site may threaten the Blackstone River, which borders the Site to the north and east. The Blackstone River is a designated National Heritage River.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The proposed actions will protect public health, welfare and the environment by removing friable asbestos from the Site. The proposed actions will include: 1) additional sampling as

¹ Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Tox FAQs Fact Sheet for Asbestos*, September 1996.

needed to define the extent of the asbestos-containing material, 2) removal of the asbestos-containing material, and 3) off-site disposal of all cleanup-derived waste streams.

2. Community relations

EPA will remain involved with the local community throughout the removal action via press releases, fact sheets, and public meetings, as needed.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques will be utilized to the extent practicable.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

29 CFR Parts 1910, 1926, and 1904: OSHA Health and Safety Regulations

40 CFR Part 300.440 Procedures for Planning and Implementing Off-Site Response Actions (Off-Site Rule)

49 CFR Parts 171-179 : Department of Transportation Regulations for Transport of Hazardous Materials

State ARARs:

The OSC will coordinate with State officials to identify additional State ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR which is identified in a timely manner.

6. Project schedule

The total project duration is estimated at less than three months, weather permitting.

B. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$35,000.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$15,000.00
Extramural Subtotal		\$50,000.00
Extramural Contingency	20%	\$10,000.00
TOTAL, REMOVAL ACTION CEILING		\$60,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

In the absence of the response action described herein, conditions at the Site can be expected to continue to deteriorate, and the threats associated with the presence of hazardous substances will persist.

VII. OUTSTANDING POLICY ISSUES

There are no precedent setting policy issues associated with this site.

VIII. ENFORCEMENT ... For Internal Distribution Only.

At this time, FDS Industries, LLC, a Potentially Responsible Party (PRP), has indicated a willingness to perform the work. EPA will pursue a PRP-lead cleanup with this party. In the event the PRP fails to perform adequately, EPA is prepared to undertake the cleanup. The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$60,000 (extramural costs) + \$20,000 (EPA intramural costs) = \$80,000 X 1.279 (regional indirect rate) = **\$102,320²**. See the attached Enforcement Strategy for additional details.

²Direct Costs include direct extramural costs \$60,000 and direct intramural costs \$20,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [27.9% x \$80,000], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Lonsdale Bleachery Site in Lincoln, Rhode Island, developed in accordance with CERCLA, as amended, and not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions as the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

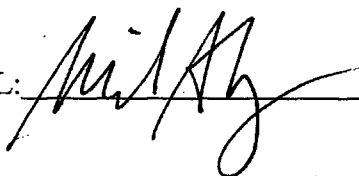
Actual or potential contamination of drinking water supplies or sensitive ecosystems [§300.415(b)(2)(ii)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released; [§300.415(b)(2)(v)];

The availability of other appropriate Federal or State response mechanisms to respond to the release; [§300.415(b)(2)(vii)].

I recommend that you approve the proposed removal action. The total removal action project ceiling if approved will be \$60,000. Of this total, no more than \$45,000 comes from the Regional removal allowance.

APPROVAL: _____



DATE: _____

12-21-04

DISAPPROVAL: _____

DATE: _____